United States District Court

WESTERN DISTRICT OF WASHINGTON AT SEATTLE

District of

	Division
) Case No. 2:18-cv-00862-MJP
OSCAR LEE OLIVE)
Plaintiff(s)	ANSWER OF HAYLEY ROBINSON TO
-v-	PLAINTIFF'S FIRST AMENDED COMPLAINT FOR DAMAGES
)
)
JUSTUS PAUL KEPPEL, et al.,))
Defendant(s))
)

Defendant Hayley M. Robinson ("Robinson") answers the Plaintiff's First Amended Complaint for Damages as follows. Unless a factual allegation is explicitly admitted below, it is denied. Answers correspond to the numbered paragraphs of the Complaint.

I. ANSWER

- 1. Robinson lacks knowledge or information sufficient to form a firm belief about the truth of the allegations in paragraph 1, therefore denies them.
- Admitted that defendants name is Hayley M. Robinson and resides at 487 Westerly Rd APT 102 Bellingham WA, 98226.
- 3. Robinson lacks knowledge or information sufficient to form a firm belief about the truth of the

- allegations in paragraph 3, therefore denies them.
- 4. Robinson lacks knowledge or information sufficient to form a firm belief about the allegations in paragraph 4, therefore denies them.
- 5. Robinson lacks knowledge or information sufficient to form a firm belief about the allegations in paragraph 5, therefore denies them.
- 6. Robinson admits reporting the Plaintiff to the police and social media as well as being involved with the NCIS investigation, but denies that it was done maliciously.
- 7. Admitted.
- 8. Robinson lacks knowledge or information sufficient to form a firm belief about the allegations in paragraph 8, therefore denies them.
- 9. Robinson admits the first sentence but denies the rest of paragraph 9.
- 10. Denied.
- 11. Robinson lacks knowledge or information sufficient to form a firm belief about the allegations in paragraph 11, therefore denies them.
- 12. Denied.
- 13. Robinson lacks knowledge or information sufficient to form a firm belief about the allegations in paragraph 13, therefore denies them.
- 14. Robinson lacks knowledge or information sufficient to form a firm belief about the allegations in paragraph 14, therefore denies them.
- 15. Robinson lacks knowledge or information sufficient to form a firm belief about the allegations in paragraph 15, therefore denies them.
- 16. Robinson lacks knowledge or information sufficient to form a firm belief about the allegations in paragraph 16, therefore denies them.
- 17. Robinson lacks knowledge or information sufficient to form a firm belief about the allegations in paragraph 17, therefore denies them.
- 18. Denied.

- 19. Denied.
- 20. Robinson incorporates her answers to paragraphs 1-20 as set forth above
- 21. Denied.
- 22. Denied.
- 23. Denied.
- 24. Robinson incorporates her answers to paragraphs 1-20 as set forth above
- 25. Denied.
- 26. Denied.
- 27. Robinson lacks knowledge or information sufficient to form a firm belief about the allegations in paragraph 27, therefore denies them.
- 28. Robinson incorporates her answers to paragraphs 1-20 as set forth above
- 29. Denied.
- 30. Robinson lacks knowledge or information sufficient to form a firm belief about the allegations in paragraph 30, therefore denies them.
- 31. Robinson lacks knowledge or information sufficient to form a firm belief about the allegations in paragraph 31, therefore denies them.
- 32. Denied.
- 33. Denied.
- 34. Robinson incorporates her answers to paragraphs 1-20 as set forth above
- 35. Robinson lacks knowledge or information sufficient to form a firm belief about the allegations in paragraph 35, therefore denies them.
- 36. Robinson lacks knowledge or information sufficient to form a firm belief about the allegations in paragraph 36, therefore denies them.
- 37. Denied.
- 38. Robinson lacks knowledge or information sufficient to form a firm belief about the allegations in paragraph 38, therefore denies them.

39. Robinson lacks knowledge or information sufficient to form a firm belief about the allegations in

paragraph 39, therefore denies them.

40. Paragraph 40 is not a factual allegation and therefore requires no answer.

II. AFFIRMATIVE DEFENSES

Robinson asserts the following affirmative defenses:

1. Some or all of Plaintiff's claims are barred by applicable statute of limitations.

2. Robinson reserves the right to assert other affirmative defenses as discovery proceeds.

DATED: 19th September, 2018

Signed: Hayley M. Robinson

4

Page of 4